

JOHN C. ELLIS, JR.
California State Bar No. 228083
FEDERAL DEFENDERS OF SAN DIEGO, INC.
225 Broadway, Suite 900
San Diego, California 92101-5030
Telephone: (619) 234-8467
Facsimile: (619) 687-2666
John_Ellis@fd.org

Attorneys for Ms. Kissane

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICOLE KISSANE (2),

Defendant.

CASE NO.: 15CR1928-LAB

JOINT MOTION TO MODIFY
CONDITIONS OF PRETRIAL
RELEASE

IT IS HEREBY JOINTLY MOVED, by and between the parties that the conditions of pretrial release for defendant, Nicole Kissane, in the above-captioned case, be modified to allow her to travel to the Toiyabe National Forest in Bridgeport, CA from August 19, 2016 through August 22, 2016. Ms. Kissane's motion is not opposed by the government or Pretrial Services. Ms. Kissane acknowledges that she is to contact her Pretrial Services Officer prior to, and upon her return from, traveling. The surety has provided written consent.

///

///

///

///

///

///

1 The parties respectfully request that this Court issue an order allowing travel
2 to the Toiyabe National Forest in Bridgeport, California from August 19, 2016 to
3 August 22, 2016.

4 Respectfully submitted,

5 Dated: August 10, 2016

s/ John C. Ellis, Jr.

6 JOHN C. ELLIS, JR.

7 Federal Defenders of San Diego, Inc.
8 Attorneys for Ms. Kissane

9 Dated: August 10, 2016

s/ John L. Parmely

10 JOHN L. PARMLEY

Assistant United States Attorney

11 Dated: August 10, 2016

s/ Irene Pflaum

12 IRENE PFLAUM

13 United States Pretrial Services Officer
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

Counsel for the Defendant certifies that the foregoing pleading has been electronically served on the following parties:

John L. Parmley
Assistant U.S. Attorney
via CM/ECF

Irene Pflaum
United States Pretrial Services Officer
via email

Respectfully submitted,

Dated: August 10, 2016

s/ John C. Ellis, Jr.

JOHN C. ELLIS, JR.
Federal Defenders of San Diego, Inc.
Attorneys for Ms. Kissane

Email: John_Ellis@fd.org